

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

In re)	Case No. 09-15769-SJS
)	
ANDREW CORRALES)	
ARGOSINO,)	
)	
Debtor.)	
)	
UNITED STATES TRUSTEE,)	Adv. Proc. No. 09-01489-SJS
)	
Plaintiff,)	
)	
vs.)	PLAINTIFF'S INITIAL DISCLOSURES
)	PURSUANT TO RULE 7026, FED. R.
ANDREW CORRALES)	BANKR. P., AND RULE 26(a)(1), FED. R.
ARGOSINO,)	CIV. P.
)	
Defendant.)	

Plaintiff, Acting United States Trustee, Robert D. Miller Jr. ("UST"), pursuant to Rule 26(a)(1), Fed. R. Civ. P., made applicable to this adversary proceeding by Rule 7026, Fed. R. Bankr. P., makes the following initial disclosures. The UST makes these disclosures based upon information currently available to him.

1 **A. Individuals likely to have discoverable information that Plaintiff may use to**
2 **support his claims, and the subjects of that information (Fed. R. Civ. P.**
3 **26(a)(1)(A)(i)):**

4 The UST believes that the individuals named below are likely to have discoverable
5 information that the UST may use to support his claims.

6 1. Andrew Corrales Argosino, Defendant, 11621 S.E. 199th Street, Renton, WA 98058,
7 and P.O. Box 40141, Bellevue, WA 98015. Mr. Argosino is likely to have information regarding
8 the Defendant's assets, debts, and financial affairs; his bankruptcy petition, schedules, and
9 statements filed in this chapter 7 case; his prior testimony at his § 341 meeting and Rule 2004
10 examination in this case; and his prepetition transfer of vehicles and funds to Karen S. Bayes, his
11 former fiancée, and his transfer of other personal property to friends and/or relatives.

12 2. Ronald G. Brown, Chapter 7 Trustee, 999 Third Avenue, Seattle, WA 98104,
13 telephone: (206) 342-7850. Mr. Brown is likely to have information regarding the trustee's
14 investigation of the Defendant's financial affairs in this bankruptcy case, including but not limited
15 to the Defendant's prepetition transfer of vehicles and funds to Karen S. Bayes and his transfer of
16 other personal property to friends and/or relatives, and the trustee's prosecution of avoidance claims
17 against Ms. Bayes.

18 3. Rory C. Livesey, Esq., 600 Stewart Street, Suite 1908, Seattle, WA 98101-2656,
19 telephone: (206) 441-0826. Mr. Livesey, counsel for the chapter 7 trustee, is likely to have
20 information regarding the chapter 7 trustee's investigation of the Defendant's financial affairs in this
21 bankruptcy case, including but not limited to the Defendant's prepetition transfer of vehicles and
22 funds to Karen S. Bayes, and the trustee's prosecution of avoidance claims against Ms. Bayes.

23 4. Alice H. Argosino, 1231 N.E. 91st Street, Seattle, WA 98115-3132. Ms. Argosino,
24 the Defendant's ex-wife, is likely to have information regarding the Defendant's financial affairs,
25 dissolution proceedings between her and the Defendant in King County Superior Court, her claims
26 against the Defendant for domestic support obligations, and the Defendant's alleged forgery of her
27 signature on convenience checks issued on credit card accounts that the Defendant had opened in

1 her name during their marriage and the Defendant's alleged deposit of these checks into his bank
2 account(s).

3 5. Karin S. Bayes, 7411 - 127th Avenue N.E., Kirkland, WA 98033. Ms. Bayes, the
4 Defendant's former fiancée, is likely to have information regarding the Defendant's prepetition
5 transfer of vehicles and funds to her and related matters.

6 6. The UST reserves the right to call as a witness at trial any individual who is identified
7 by the Defendant in his initial disclosures, or who is discovered or identified in the course of
8 discovery.

9 **B. Description of all documents that Plaintiff has in his possession, custody, and**
10 **control, and that Plaintiff may use to support his claims (Fed. R. Civ. P.**
11 **26(a)(1)(A)(ii)):**

12 1. The Defendant's petition, schedules, statement of financial affairs, and means test
13 statements (Form B22A), and any amendments thereto, filed in this bankruptcy case; and all tax
14 returns, pay advices, bank and other financial account statements, credit card and loan statements,
15 and any additional financial or other documents provided by the Defendant to the UST or the chapter
16 7 trustee prior to the filing of this adversary proceeding.

17 2. The transcript of the Defendant's § 341 meeting held on July 14, 2009, July 30, 2009,
18 and August 13, 2009, electronically recorded by the UST.

19 3. The transcript of the Rule 2004 examination of the Defendant, conducted on
20 September 1, 2009, and all exhibits thereto.

21 4. The transcript of the Rule 2004 examination of Karen S. Bayes, conducted on
22 October 7, 2009 (ordered but not yet received), and all exhibits thereto, and all other documents
23 produced by Ms. Bayes to the UST.

24 **C. Computation of damages (Fed. R. Civ. P. 26(a)(1)(A)(iii)):**

25 Not applicable. Plaintiff is not seeking any award of monetary damages in this adversary
26 proceeding. Plaintiff is seeking denial of the Defendant's discharge pursuant to 11 U.S.C. §§
727(a)(2), (a)(3), (a)(4), and/or (a)(5).

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